

ADDITIONAL COMMENTS DRAFT PROPOSED SURFACE WATER INTERIM MEASURES/INTERIM REMEDIAL ACTION PLAN/ENVIRONMENTAL ASSESSMENT AND DECISION DOCUMENT 903 PAD, MOUND, AND EAST TRENCHES AREAS OU2. 12 JUNE 1990

The following comments, dealing for the most part on the risk assessment are from N. Morin, Rocky Flats Program Unit Epidemiologist.

Page 2-41 Section 2.3.6 Although I am not familiar with radiological standards, the likely question which is not answered here is "under what conditions does the State DOE standard apply?"

Page 2-44 Section 2.3.7 I am not familiar with hydrologic conditions at the RFS, however, I would suggest three questions in regard to the discussion of inorganic concentrations. Could the elevated inorganic concentrations measured at the well furthest away from the SWMU reflect migration of those contaminants from elsewhere, such as a anthropogenic source? Is there a gradient associated with the concentrations in the well's vicinity which suggests direction of migration? Are changes in the water table elevation at the RFP demonstratable (e.g., groundwater quality data for the front range)?

Page 2-44 Section 2.5 Does the NPDES permit and the IM/IRA address VOC's and radionuclides? What is meant by "facilitate contaminated water management?"

Page 3-3 Section 3.3.1 Is there a precedent or guidance for the proposed screening process for potential ARAR's? Are the RCRA Land Disposal Restrictions etc. health based? If not, is there a provision for substitution with values which are (e.g., based on risk estimates generated from cancer potency factors. RfDs, Water Quality Criteria)?

Chapter 7 Is there adequate oversight or accountability of/by JSA/HS&E?

Page 7-7, Para. 1 The information provided leaves it unclear if the non-cancer risk summation is properly applied. Are all non-cancer related risks being summed or only those related to similar organ systems.

Page 7-7, Para. 3 What is the basis of the 30 year exposure period assumption?

Page 7-8, Para. 1 Not able to evaluate.

Page 7-12 7-18 Quantitative assumptions and calculations used in estimating adverse health outcome risk are not provided and therefore cannot be assessed.

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